

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
                            )  
                            ) CRIMINAL NO. 04-10288-RWZ  
v.                         )  
                            )  
CARLOS ESPINOLA, ET AL., )  
Defendants                 )  
                            )

**Government's Revised Exhibit List**

The United States of America, by Michael J. Sullivan, United States Attorney, and Michael J. Pelgro and David G. Tobin, Assistant U.S. Attorneys, hereby files this list of exhibits which it may introduce at the trial of the above-captioned action. The government reserves the right to amend this list upon reasonable notice to the defendants.

1. Chart of Defendants (with photographs);
2. Chart of Controlled Purchases;
3. Map of Gloucester and Peabody;
4. Photographs of Riverdale Park Housing Development, Gloucester, MA;
5. Registry of Motor Vehicles records for defendants Carlos Espinola and Joseph Allen;
6. Excerpts of consensual recording of meeting among Keith Behsman, Maurice Aguiler, and Amauris Calcano on November 4, 2003 (DEA Exhibit N-7);
7. Aerial photographs of North Shore Mall, Bugaboo Creek Restaurant, and 63 Endicott Street, Peabody, MA;

8. OxyContin pills (98) purchased on November 25, 2003  
(DEA Exhibit 15);

9. Excerpts of consensual recording of meeting among Keith Behsman, Joseph Baldassano, Jared Knowlton, Maurice Aguiler, and Amauris Calcano on December 2, 2003 (DEA Exhibit N-33);

10. OxyContin pills (100) purchased on December 2, 2003  
(DEA Exhibit 17);

11. OxyContin pills (100) purchased on December 12, 2003  
(DEA Exhibit 21);

12. Photographs of 63 Endicott Street, Peabody, MA;

13. Photographs of co-defendant Jonathan Mitchell's Gloucester residence;

14. Excerpt of consensual recording of meeting among Keith Behsman, Maurice Aguiler, and Amauris Calcano on January 6, 2004  
(DEA Exhibit N-54);

15. OxyContin pills (100) purchased on January 6, 2004 (DEA Exhibit 25);

16. Excerpt of consensual recording of meeting among Keith Behsman, Joseph Baldassano, Maurice Aguiler, and Amauris Calcano on January 14, 2004 (DEA Exhibit N-63);

17. OxyContin pills (100) purchased on January 14, 2004  
(DEA Exhibit 28);

18. Consensual recording of telephone conversations with Keith Behsman on January 15, 2004 (DEA Exhibit N-78);

19. Excerpt of consensual recording of telephone conversation with Joseph Baldassano on January 27, 2004 (DEA Exhibit N-79);

20. Excerpt of consensual recordings of telephone conversation with Keith Behsman on February 25, 2004 (DEA Exhibit N-205A);

21. Excerpts of consensual recordings of telephone conversations with Joseph Baldassano on March 16 and 17, 2004 (DEA Exhibit N-205B);

22. Consensual recording of telephone conversation with Keith Behsman on March 17, 2004 (DEA Exhibit N-205C);

23. Excerpts of consensual recordings of telephone conversations with Joseph Baldassano on March 23, 2004 and April 6, 2004 (DEA Exhibit N-205D);

24. Photographs of Joseph Baldassano, Carlos Espinola, and others obtained from Joseph Baldassano;

25. Consensual recording of telephone conversation with Guiseppe Torrente on February 4, 2004 (DEA Exhibit N-84);

26. Excerpts of consensual recording of meeting among Joseph Baldassano, Glen Coletti, and a cooperating individual on June 7, 2004 (DEA Exhibit N-179);

27. Surveillance videotape depicting Joseph Allen on June 7, 2004 (DEA Exhibit N-180);

28. OxyContin pills (100) purchased on June 7, 2004 (DEA Exhibit 83);

29. Photographs of 20 Tracy Street, Peabody, MA;

30. Photographs of 220 Washington Street, Gloucester, MA;

31. Photographs of 40 Sarah Avenue, Lowell, MA;

32. Excerpts of consensual recording of meeting among Joseph Baldassano, Jose Melo, and Glen Coletti on June 10, 2004 (DEA Exhibit N-184);

33. OxyContin pills (100) purchased on June 10, 2004 (DEA Exhibit 84);

34. Matthew Cream's cellular telephone and photograph contained within it recovered on June 29, 2004 (DEA Exhibit N-197);

35. Sprint PCS Wireless subscriber information for cell phone listed in number 34 above;

36. Joseph Baldassano's cellular telephone and list of telephone numbers contained within it recovered on June 29, 2004 (DEA Exhibit N-196);

37. Rental receipts for Baldassano and Cream's Lowell apartment and business card recovered from Joseph Baldassano on June 29, 2004 (DEA Exhibit N-204);

38. Carlos Espinola's cell phone recovered on June 30, 2004 (DEA Exhibit N-199) and typed copy of the cell phone's number directory;

39. Prepaid cell phone receipt, photograph, birthday card, passport, dog tag, and photograph of Carlos Espinola, Michelle Dawicki, and an unidentified male recovered from Carlos Espinola on June 30, 2004 (DEA Exhibit N-199);

40. Ballistic vest recovered from 63 Endicott Street on June 30, 2004 (DEA Exhibit N-195);

41. Telephone records;

42. Scale recovered from Carlos Espinola's apartment (DEA Exhibit N-198);

43. Booking photo of Carlos Espinola's "Red Devils" tattoo;

44. Jose Melo's cell phone (DEA Exhibit N-194), with typed copy of the cell phone's number directory, and subscriber information;

45. Excerpt of consensual recordings of telephone conversations with Joseph Baldassano on June 28 and 29, 2004 (DEA Exhibit N-186);

46. Resume of DEA chemist Roger W. Godino; and

47. DEA-7 reports for all of the OxyContin from the charged defendants, along with associated DEA lab paperwork.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/Michael J. Pelgro  
Michael J. Pelgro  
David G. Tobin  
Assistant U.S. Attorneys

DATED: May 4, 2006.

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that a paper copy will be sent to those indicated as non-registered participants on May 4, 2006.

/s/Michael J. Pelgro  
Michael J. Pelgro  
Assistant U.S. Attorney